

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

INSPIRED PURSUITS, LLC, *et al.*

Plaintiffs,

v.

Case No. 3:25-cv-00075-wmc

PARAGON COMPONENT SYSTEMS,
LLC, *et al.*,

Defendants.

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiffs, Inspired Pursuits, LLC, Qualtim, Inc., Center for Building Innovation, LLC, DRJ Engineering, LLC, Kirk Grundahl, and Suzanne Grundahl, and all defendants Paragon Component Systems, LLC, John Holland, James Holland, Clearspan Components, LLC, Andrew Ewin, David Reed, Scott Hoelsma, Seth Duncan, Michael Pitts, Avery Radmacher, Nathan Bierema, Jeremy Bierema, Rob Eason, and The Estate of Daniel Holland ex rel. Special Executor Marvin B. Speed, by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(c), respectfully move this Court for entry of the proposed Agreed Protective Order attached as **Exhibit A**.

As grounds, the parties submit that certain information produced during pretrial discovery in this action may be of a confidential and private nature. The parties have conferred and agreed upon the terms of the Agreed Protective Order in order to facilitate the discovery process. Accordingly, the parties respectfully request that the Court enter the Agreed Protective Order attached as **Exhibit A**.

s/Erin Steelman

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Counsel for Plaintiffs Qualtim, Inc., DRJ Engineering, LLC, Center for Building Innovation, LLC, Kirk Grundahl, Suzanne Grundahl, and Inspired Pursuits, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 1ST day of May 2025, a copy of the foregoing Joint Motion for Entry of Agreed Protective Order was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/Michael J. Bradford

Michael J. Bradford

Counsel for Plaintiffs